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Attorney for defendant EDWIN BALERO

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
EDWIN WILLIAM BALERO,  
  
Defendant.

No. 99-CR-401/12-CR-0369 JAM  
  
**STIPULATION AND ORDER TO  
CONTINUE STATUS CONFERENCE**

The defendant, EDWIN BALERO, through his undersigned counsel, and the United States, through its undersigned counsel, hereby agree and request that the status conference currently set for Tuesday, June 10, 2014 at 9:30 am be vacated and continued until Tuesday, June 24, 2014 at 9:30 am.

A continuance is necessary to provide the parties with additional time for case preparation, investigation, and ongoing plea and sentencing negotiations. Defense counsel has been dealing with an ongoing family crisis involving the illness of his sister-in-law, who passed away yesterday morning, June 4th. Additionally, counsel was recently notified that his client has been moved from the Sacramento County Main Jail to the Colusa

County Jail approximately 1 hour outside of Sacramento.

The parties stipulate that time should be excluded under the Speedy Trial Act to allow the defendant continuity of counsel and to provide the parties additional time for case preparation and ongoing plea and sentencing negotiations. Local Code T4 & 18 U.S.C § 3161 (h)(7)(B)(iv).

I, William E. Bonham, the filing party, have received authorization from AUSA Michael McCoy to sign and submit this stipulation and proposed order on his behalf.

Accordingly, the defense and the United States agree and request that the status conference for defendant EDWIN BALERO, be continued to Tuesday, June 24, 2014 at 9:30 am. The parties stipulate that the ends of justice served by granting this continuance outweigh the best interests of the public and defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Dated: June 5, 2014

BENJAMIN B. WAGNER  
United States Attorney

By:/s/ WILLIAM E. BONHAM for  
MICHAEL MCCOY  
Assistant U.S. Attorney

Dated: June 5, 2014

By:/s/ WILLIAM E. BONHAM for  
WILLIAM E. BONHAM  
Counsel for Defendant  
EDWIN BALERO

**ORDER**

IT IS SO ORDERED. The status conference for defendant, EDWIN BALERO, currently set for Tuesday, June 10, 2014 at 9:30 am is vacated and continued to Tuesday, June 24, 2014 at 9:30 am.

I find that the continuance is necessary due to the needs of counsel for additional case preparation and plea/sentencing negotiations as defense counsel has been dealing with an ongoing family crisis, the defendant was recently moved and that a failure to do so would deny counsel reasonable time for effective preparation, taking into account the exercise of due diligence, and the defendant continuity of counsel. Accordingly, time is excluded under the Speedy Trial Act, due to needs of counsel for additional case preparation and ongoing plea/ sentencing negotiations, from June 10, 2014 up to and including June 24, 2014 pursuant to Local Code T4 and 18 U.S.C. § 3161(h)(7)(B)(iv). I find that the ends of justice served by granting this continuance outweigh the best interest of the public and defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

Dated: June 5, 2014

/s/ John A. Mendez\_\_\_\_\_  
HON. JOHN A. MENDEZ  
U.S. DISTRICT COURT JUDGE